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S.D.A. - Forest Service • State & Private Forestry - Northeastern Area • Broomall, Pennsylvania

No. 1

DECEMBER 1978

A PESTICIDE NEWS QUARTERLY

This is a newsletter about pesticides. It is prepared for the forester and/or land manager who is responsible for correct and safe pesticide use management and who is interested in keeping abreast of changes and new developments in the pesticide regulatory process.

Topics discussed in this issue include: Amendments to the Federal Pesticide Laws, Certification of Federal Employees to Use or Supervise the Use of Restricted Pesticides; the RPAR Process; and Lists of Restricted Use Pesticides.

The success of this letter will depend upon its usefulness to the reader. Therefore, let us know what information you feel would make the newsletter more valuable.

Since this is a quarterly publication, our next issue will be released sometime in March. We will welcome receiving items of broad interest that you would like to share with other readers. Please send your comments to USDA Forest Service, S&PF, EQE, 370 Reed Road, Broomall, PA 19008.

FEDERAL CERTIFICATION OF PESTICIDE APPLICATORS

Federal employees currently using or supervising the use of restricted use pesticides, must be certified by the state in which they are working. However, the EPA is presently reviewing a USDA certification plan that will, when approved, allow USDA agencies (including the Forest Service) to certify their own employees. This plan is called the USDA Federal Agency Plan.

Full implementation of the USDA plan will eliminate the need for Federal employees to become certified in each of several states where they might be working with restricted use pesticides. Also, employees with current certification under State plans will be automatically certified under an approved USDA plan without additional testing. That is, the USDA plan has a "Grandfather clause."

It is unlikely that the USDA plan will be approved by the EPA and implemented by the Forest Service until the middle of 1979. This means that our employees will have to continue to become certified in each state where they use or supervise the use of restricted use pesticides.

REBUTTABLE PRESUMPTION AGAINST REGISTRATION (RPAR)

Sometimes intimidation or fear can indirectly regulate or influence the use of a pesticide. This could be the case with some pesticides that have been RPARED or classified as RPAR candidates.

It is not the intention of the EPA (through the RPAR process) to maintain a "Black List" of certain pesticides and thereby alter or adjust their use patterns. If they are registered - USE THEM!

The following is a list of the more common pesticides used by the forester or land manager. A brief update on where they stand in the RPAR process is included:

- 2,4,5-T - An RPAR was issued on 2,4,5-T on April 21, 1978. The rebuttal period officially closed on August 4, 1978. Since then EPA has been making a Risk/Benefit analysis. This analysis will ultimately lead to a preliminary decision by the administrator of EPA (expected in mid 1979) whether to cancel or restrict some or all uses of 2,4,5-T. The USDA and the Scientific Advisory Panel will then have 30 days in which to comment. Their comments will be weighed by EPA and 30 days later a final decision will be made.

No matter what the final decision is by EPA, it is expected to be challenged in the courts. Therefore, the 2,4,5-T issue is likely to be with us for years. And so is 2,4,5-T unless EPA discovers some new evidence that indicates 2,4,5-T is an imminent hazard.

- 2,4,5-TP - Silvex is still undergoing pre-RPAR review. That is, it has not been decided whether there are substantive reasons to undergo Risk/Benefit analysis.
- Dimilin - Dimilin is also undergoing pre-RPAR review. Even though this chemical has not been RPARED, it is likely that the EPA administrator will make a decision sometime during February or March 1979. The decision will probably be made at the request of the manufacturer in lieu of the normal RPAR process.
- Wood Preservatives - Cresote, Coal Tar, Pentachlorophenol, and Inorganic Arsenicals were RPARED on October 18, 1978. The 45-day rebuttal period was recently extended and will close February 12, 1979.
- Carbaryl - Carbaryl is undergoing pre-RPAR review. A decision on whether it will be RPARED is not expected until mid 1979. There is a good likelihood that the chemical will not be RPARED.

Endrin - EPA's preliminary decision has been made to cancel the use of endrin on ornamentals. Some forestry uses will also be cancelled unless modifications are made to the label. Modifications will require female applicators to wear protective clothing when applying the chemical and will impose other application restrictions. The USDA and SAP have 30 days to comment before the EPA makes its final decision.

Some other RPAred active ingredients are:

BENOMYL
CHLOROFORM
EBDC
ETHYLENE DIBROMIDE
LINDANE & BHC
TOXAPHENE

FIFRA AMENDMENTS

On September 30, 1978, the President signed into law the Federal Pesticide Act of 1978. This act further amends the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and will have considerable impact on how we use pesticides in the future.

One of the major amendments to FIFRA changes the meaning of the term "using a pesticide in a manner inconsistent with its labeling." Prior to September 30, these words were to be taken literally. However, with the amendments, we will now be permitted to use a pesticide at any dosage, concentration, or frequency less than that specified on the labeling. Also, we will now be able to apply a pesticide against any target pest not specified on the labeling provided the application is made to the crop, animal or site specified on the labeling. In addition, any method of application can ~~not~~ be used provided it is not prohibited by the labeling. This does not mean that pesticides can be used without discretion.

These changes replace the seven Pesticide Enforcement Policy Statements (PEPS) that we earlier had to utilize in order to use a pesticide in certain questionable ways.

Other important amendments to the FIFRA will give states added authority to register pesticides to meet special local needs and will place wider enforcement responsibilities upon the states.

Implementation of some of these amendments will be further clarified by the Environmental Protection Agency when they issue Policy Statements and/or Regulations. We'll keep you informed as the situation develops.

RESTRICTED USE PESTICIDES

On February 8, 1978, EPA classified, as restricted, certain uses of 23 active ingredients thus limiting them to use by or under the direct supervision of certified pesticide applicators. All labeling changes were to be completed in 270 days so that on November 8, 1978, the labels of certain products containing the listed active ingredients, coming from the manufacturer, must show the restricted use classification statement.

The active ingredients are:

ACROLEIN	ENDRIN	PARAQUAT
ACRYLONITRILE	ETHYL PARATHION	PICLORAM
ALDICARB	FLUOROACETAMIDE	SODIUM CYANIDE
ALLYL ALCOHOL	HYDROCYANIC ACID	SODIUM FLUOROALLETATE
ALUMINUM PHOSPHIDE	METHOMYL/LANNATE	STRYCHNINE
AZINOPHOS METHYL	METHYL BROMIDE	SULFOTEPP
CALCIUM CYANIDE	METHYL PARATHION	TEPP
DEMETON	MEVINPHOS/PHOSDRIN	

In addition to the above listed active ingredients, some states have identified others for restricted use. Thus, some state lists will be more extensive than the EPA's.

If there are questions concerning what pesticide products are restricted or to determine certification needs within a certain state, contact us, the State Cooperative Extension Service, or the State Lead Agency. In most states, the State Department of Agriculture is designated as the lead agency.

PESTICIDE LABEL GUIDE FOR SHADE AND ORNAMENTAL TREES

A pesticide label guide has been developed to assist the urban forester, arborists and others concerned with urban shade and ornamental tree care to find properly registered products. The guide will be distributed to State Foresters, and selected Forest Service offices.

Making the proper choice from the more than thirty thousand pesticide products registered by the Environmental Protection Agency (EPA) is often difficult, even for professional applicators. In the urban situation, this is further complicated by the wide range of pests and hosts encountered, and by the high intrinsic value of the individual tree or shrub species. Also, it is here that the people/pesticide interface is most critical and where pesticide decisions are most apt to be very carefully examined by the public.

The guide is a collection of product labels and access keys. An effort is made to include the more important pests of shade and ornamental trees common to the Northeastern Area, and to match these with sample pesticide labels of federally registered products.

There are three major sections in the guide: FUNGICIDE (including bactericides), INSECTICIDE (including miticides and nematicides), and HERBICIDE. Host/pest keys to active ingredients and specific products are provided for the FUNGICIDE and INSECTICIDE sections.

A limited supply of the label guides is available. Single copy requests will be filled on a first request basis.

